

UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH

ALEX TAYLOR and NALLELY TAYLOR	)	
	)	
Plaintiff,	)	
	)	CASE NO.: 2:19-cv-00120-EJF
v.	)	
	)	
NATIONAL COLLEGIATE STUDENT	)	
LOAN TRUST 2007-1, TRANSWORLD	)	
SYSTEMS, INC., EGS FINANCIAL	)	
CARE, INC., fka NCO FINANCIAL	)	
SYSTEMS, INC., and JOHN DOES	)	
I through X	)	
	)	
Defendants.	)	
	)	

**UNOPPOSED MOTION TO EXTEND DISCOVERY DEADLINE**

Defendants, National Collegiate Student Loan Trust 2007-1, EGS Financial Care, Inc, f/k/a NCO Financial Systems and Transworld Systems, Inc. (hereinafter, collectively “Defendants”), request the Court enter an Order extending the current discovery deadline by two weeks and adjust the dispositive motion deadline accordingly.

1. Plaintiff Alex Taylor served interrogatories and requests for production on each of the three defendants on July 19, 2019. Responses are presently due by August 19, 2019.

2. Defendants require an additional two weeks to complete the discovery responses. Plaintiff has agreed to the extension request subject to an extension of the current discovery deadline by two weeks.

WHEREFORE, Defendants respectfully request this Court grant this motion and extend the current discovery deadline of October 30, 2019 by two weeks through November 15, 2019 and extend the current dispositive motion deadline of November 15, 2019 by two weeks through December 2, 2019, and for such other relief as this Court deems proper.

Dated: August 16, 2019

Respectfully submitted,

/s/ Michael D. Alltmont

Michael D. Alltmont (admitted pro hac)  
Sessions, Fishman, Nathan, & Israel  
3850 N. Causeway Blvd., Ste. 200  
Metairie, La. 70002  
Telephone: 504-846-7954  
Facsimile: 504-828-3737

George W. Burbidge II, Esq.  
Christensen & Jensen, P.C.  
275 East 200 South, Suite 1100  
Salt Lake City, Utah 84111  
Telephone: (801) 524-9380  
Facsimile: (801) 355-3472

Attorneys for Defendants,  
National Collegiate Student Loan Trust  
2007-1, EGS Financial Care, Inc, f/k/a NCO  
Financial Systems and Transworld Systems,  
Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that on August 16, 2019, a copy of the foregoing was electronically filed with the Clerk of the Court, United States District Court for the District of Utah and served via CM/ECF to all counsel of record.

Ronald Ady, Esq.  
Debt Defense Utah  
8 E. Broadway, Ste 725  
Salt Lake City, UT 84111

/s/ Michael D. Alltmont

Attorney